

# **EXHIBIT “A”**

KAMENSKY, COHEN & RIECHELSON  
BY: KEVIN S. RIECHELSON  
I.D. #: 58960  
194 S. BROAD ST.  
TRENTON, NJ 08608  
609-394-8585  
609-394-8620 (F)

[KRIESELSON@KCRLAWFIRM.COM](mailto:KRIESELSON@KCRLAWFIRM.COM)



NAOMI CARRERA

v.

AALIYAH MONET MONT, HIGH :  
PROOF LOGISTICS, LLC :  
AMAZON a/k/a AMAZON, INC, :  
a/k/a AMAZON LOGISTICS, :  
a/k/a AMAZON SERVICES, LLC, :  
a/k/a AMAZON CORP. AND/OR :  
JOHN DOES I-V and JOHN DOE :  
CORPORATIONS VI-X :

: IN THE COURT OF COMMON PLEAS  
: PHILADELPHIA

: NO.

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Court of Common Pleas of Philadelphia County  
Trial Division**Civil Cover Sheet**

			For Prothonotary Use Only (Docket Number)	
			<b>NOVEMBER 2022</b>	
			E-Filing Number: 2211007822	
<b>PLAINTIFF'S NAME</b> NAOMI CARRERA			<b>DEFENDANT'S NAME</b> AALIYAH MONET MONT	
<b>PLAINTIFF'S ADDRESS</b> 261 S, OLDEN AVENUE TRENTON NJ 08629			<b>DEFENDANT'S ADDRESS</b> 3319 N. 20TH STREET PHILADELPHIA PA 19140	
<b>PLAINTIFF'S NAME</b> PLAINTIFF'S ADDRESS			<b>DEFENDANT'S NAME</b> AMAZON, ALIAS: A.K.A. AMAZON CORP.	
PLAINTIFF'S ADDRESS			<b>DEFENDANT'S ADDRESS</b> 2400 WECCACOE AVENUE PHILADELPHIA PA 19148	
<b>PLAINTIFF'S NAME</b> PLAINTIFF'S ADDRESS			<b>DEFENDANT'S NAME</b> HIGH PROOF LOGISTICS, LLC	
PLAINTIFF'S ADDRESS			<b>DEFENDANT'S ADDRESS</b> 2016 DICKINSON STREET PHILADELPHIA PA 19146	
<b>TOTAL NUMBER OF PLAINTIFFS</b> 1	<b>TOTAL NUMBER OF DEFENDANTS</b> 3	<b>COMMENCEMENT OF ACTION</b> <div style="display: flex; justify-content: space-around;"> <input checked="" type="checkbox"/> Complaint      <input type="checkbox"/> Petition Action      <input type="checkbox"/> Notice of Appeal  <input type="checkbox"/> Writ of Summons      <input type="checkbox"/> Transfer From Other Jurisdictions       </div>		
<b>AMOUNT IN CONTROVERSY</b> <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	<b>COURT PROGRAMS</b> <input type="checkbox"/> Arbitration <input type="checkbox"/> Jury <input checked="" type="checkbox"/> Non-Jury <input type="checkbox"/> Other:	<input type="checkbox"/> Mass Tort <input type="checkbox"/> Savings Action <input type="checkbox"/> Petition	<input type="checkbox"/> Commerce <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Statutory Appeals	<input type="checkbox"/> Settlement <input type="checkbox"/> Minors <input type="checkbox"/> W/D/Survival
<b>CASE TYPE AND CODE</b> 20 - PERSONAL INJURY - OTHER				
<b>STATUTORY BASIS FOR CAUSE OF ACTION</b>				
<b>RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)</b>			<b>FILED PRO PROTHY</b> <b>NOV 03 2022</b> <b>A. STAMATO</b>	<b>IS CASE SUBJECT TO COORDINATION ORDER?</b> YES      NO
<b>TO THE PROTHONOTARY:</b> Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>NAOMI CARRERA</u> Papers may be served at the address set forth below.				
<b>NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY</b> KEVIN S. RIECHELSON		<b>ADDRESS</b> 194 S BROAD ST TRENTON NJ 08608		
<b>PHONE NUMBER</b> (609) 394-8585	<b>FAX NUMBER</b> (609) 394-8620			
<b>SUPREME COURT IDENTIFICATION NO.</b> 58960		<b>E-MAIL ADDRESS</b> kriechelson@kcrlawfirm.com		
<b>SIGNATURE OF FILING ATTORNEY OR PARTY</b> <u>KEVIN RIECHELSON</u>		<b>DATE SUBMITTED</b> Thursday, November 03, 2022, 03:07 pm		

KAMENSKY, COHEN & RIECHELSON  
BY: KEVIN S. RIECHELSON  
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NAOMI CARRERA	:	IN THE COURT OF COMMON PLEAS
V.	:	: PHILADELPHIA
	:	
	:	: NO.
AALIYAH MONET MONT, HIGH	:	
PROOF LOGISTICS, LLC	:	
a/k/a AMAZON LOGISTICS,	:	
a/k/a AMAZON SERVICES, LLC,	:	
a/k/a AMAZON CORP. AND/OR	:	
JOHN DOES I-V and JOHN DOE	:	
CORPORATIONS VI-X	:	

**COMPLAINT**

1. At all times material hereto, plaintiff, Naomi Carrera, was an adult individual residing at 261 S. Olden Avenue, Trenton, New Jersey 08629.
2. At all times material hereto, defendant, Aaliyah Monet Mont, was an adult individual residing at 3319 N. 20<sup>th</sup> Street, Philadelphia, PA 19140, and was the driver of a Ram truck that was involved in a collision with the plaintiff's vehicle on December 24, 2020.
3. At all times material hereto, defendant, John Does I-V, were adult individuals, whose identities are unknown, who was/were the driver and/or owner and /or lessee of the vehicle that collided with plaintiff's vehicle on December 24, 2020.
4. At all times material hereto, defendants, High Proof Logistics, LLC, Amazon a/k/a Amazon, Inc., a/k/a Amazon Logistics, a/k/a Amazon Services, LLC, a/k/a Amazon

Corp., and/or John Doe Corporations VI-X were the employers of defendant, Aaliyah Monet Mont and/or John Does I-V, who were working in the course and scope of their employment with defendants at the time of the within accident.

5. On December 24, 2020, plaintiff was operating her vehicle and had stopped due to traffic conditions when suddenly and without warning, plaintiff's vehicle was struck from behind by defendant(s)' vehicle.
6. As a result of the impact of defendant(s)' vehicle and plaintiff's vehicle, plaintiff was injured.
7. Defendants were negligent in the operation of their vehicle, and caused the collision with the plaintiff.
8. Defendants were negligent in the operation of their vehicle in that they:
  - a. Failed to maintain their lane of travel;
  - b. Failed to stop for vehicles that were stopped in the roadway;
  - c. Failed to avoid a collision with the rear of plaintiff's vehicle
  - d. Failed to pay attention to the condition of traffic;
  - e. Failed to have their vehicle under control at all times;
  - f. Failed to maintain an assured clear distance from other vehicles on the roadway;
  - g. Failed to have their motor vehicle under proper and adequate control under the circumstances;
  - h. Failed to have due regard for the point and position of said motor vehicle containing the plaintiff;

- i. Violated of the statutes of the Commonwealth of Pennsylvania and local ordinances;
- j. Otherwise failed to exercise due care under the circumstances;
- k. Such other acts of carelessness and negligence as will appear in the course of discovery to be conducted pursuant to the Pennsylvania Rules of Civil Procedure at the time of trial in this case.

9. As a result of Defendant(s)' negligence and carelessness, Plaintiff suffered injuries to her head, shoulder, neck and back and suffered an exacerbation of pre-existing conditions. The injuries sustained are or may be serious, severe, and permanent.
10. As a result of Defendant's negligence and carelessness, Plaintiff has had to undergo medical treatment and continues to suffer from the injuries sustained in the accident; such injuries have caused and may continue to cause Plaintiff mental anguish and pain and suffering; such injuries have prevented and may continue to prevent Plaintiff from attending her usual activities and duties.
11. As a result of Defendant's negligence and carelessness, Plaintiff incurred medical bills that may be subject to a lien.
12. In addition, as plaintiff is not a resident of Pennsylvania, she is not subject to the P.A.M.V.F.R.L. 1720 and 1722, and is entitled to recovery of her medical bills.
13. Defendants, Amazon a/k/a Amazon, Inc., a/k/a Amazon Logistics, a/k/a Amazon Services, LLC, a/k/a Amazon Corp., and/or John Doe Corporations VI-X, are vicariously liable for the acts and/or omissions of their employees, agents, servants and/or workmen, who were acting on their behalf, and in the course and scope of their employment, when their negligence caused the accident with the plaintiff's vehicle.

14. Defendants, Amazon a/k/a Amazon, Inc., a/k/a Amazon Logistics, a/k/a Amazon Services, LLC, a/k/a Amazon Corp., and/or John Doe Corporations VI-X, are liable under the theory of respondeat superior for the acts and/or omissions of their employees, agents, servants and/or workmen, who were acting on their behalf, and in the course and scope of their employment, when their negligence caused the accident with the plaintiff's vehicle.

**WHEREFORE**, Plaintiff, demands judgment against Defendant for compensatory damages, together with interest and costs of suit, in an amount in excess of \$50,000.

Law Offices of  
**KAMENSKY ♦ COHEN & RIECHELSON**

*Kevin Riechelson*

BY:

---

KEVIN S. RIECHELSON, ESQUIRE  
Attorney for Plaintiffs  
194 South Broad Street  
Trenton, New Jersey 08608  
(609) 394-8585

Dated: November 3, 2022

**VERIFICATION TO COMPLAINT**

Plaintiff verifies that the statements made in this Complaint are true and correct to the best of my knowledge. Plaintiff understands that false statements made herein are made subject to the penalties of 18 P.A.C.S., Section 4904, relating to unsworn falsification to authorities.

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11-7-22